

# Exhibit 17

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

LULA WILLIAMS, GLORIA TURNAGE,	:	
GEORGE HENGLE, DOWIN COFFY, and	:	Civil Case No. 3:17cv461
FELIX GILLISON, JR., <i>on behalf of themselves</i>	:	
<i>and all individuals similarly situated,</i>	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
BIG PICTURE LOANS, LLC, et al.,	:	
	:	
Defendants.	:	
	:	

---

**DEFENDANT MATT MARTORELLO’S REVISED OBJECTIONS AND RESPONSES  
TO PLAINTIFF LULA WILLIAMS’ FIRST SET OF INTERROGATORIES**

Defendant Matt Martorello (“Martorello”), by counsel and pursuant to Federal Rules of Civil Procedure 26 and 33, and Local Rule 26 of the United States District Court for the Eastern District of Virginia, objects and responds to Plaintiff Lula Williams’ First Set of Interrogatories (“Interrogatories”) as follows:

**PRELIMINARY STATEMENT**

Martorello’s objections to Plaintiffs’ Interrogatories have been revised at the request of Plaintiffs’ counsel following multiple discussions and communications between counsel on the subject of discovery. Martorello is not challenging jurisdiction in this action, and therefore believes that the Court’s August 31, 2017 Order is not applicable to him. Nonetheless, Martorello has agreed to participate in the discovery process at this time because Plaintiffs’ jurisdictional discovery is, at least as to Martorello, largely duplicative of – if not identical to – merits discovery for this case. Martorello’s present participation in the discovery process is done

with the express understanding and agreement of Plaintiffs' counsel that Martorello will not later be subject to duplicative discovery – by deposition or otherwise – in this action.

These objections and responses are made while Martorello's investigation of the Plaintiffs' allegations is continuing. Martorello is in the process of identifying, collecting, and reviewing documents and information which may be responsive to Plaintiffs' Requests. As Plaintiffs are aware, this effort has been hampered by Hurricane Maria, which has severely affected Martorello's Puerto Rico-based business office, as well as the Puerto Rico-based third-party e-mail servicing company used by Martorello's company.

### **OBJECTIONS AND RESPONSES TO INTERROGATORIES**

1. Identify the total income and all financial benefits you have received as a result of your relationship with Big Picture Loans, Ascension Technologies, Red Rock Tribal Lending, and Tribal Economic Development Holdings.

#### **RESPONSE:**

**The Court's September 1, 2017 Order limits discovery to what is necessary to determine jurisdiction over Defendants. Martorello has not, and will not, contest that this Court has personal jurisdiction over him under applicable Fourth Circuit case law. As such Martorello objects to this Interrogatory as it is not relevant to jurisdiction and is violative of the Court's September 1, 2017 Order and Federal Rule of Civil Procedure 26(d). Nonetheless, as explained in the above "Preliminary Statement" which is incorporated herein as if set forth at length, Martorello will, subject to the following objections, respond to this Interrogatory in that it is duplicative of merits discovery as to Martorello and is being treated as merits discovery by Martorello.**

**Martorello objects to this Interrogatory on the grounds that it is not limited to information relevant to a party's claims or defenses in this case and requests information not proportional to the needs of this case. Specifically, the Interrogatory is overly broad in that it is not limited to information relating to loans made to Virginia residents or limited in scope to the relevant time period for this case.**

**Martorello objects to this Interrogatory on the ground that "income" and "financial benefits" are vague and undefined terms.**

**Subject to and without waiving the foregoing, Martorello responds as follows:**

**Based upon the information currently available to him, Martorello has received \$58,227,931 in salary and/or distributions from companies with relationships with Big Picture Loans, LLC, Ascension Technologies, LLC, Red Rock Tribal Lending, LLC, and Tribal Economic Development Holdings, LLC. Martorello is also aware that Eventide Credit Acquisitions, LLC – a company in which Martorello has a financial interest – has received a promissory note from Tribal Economic Development Holdings, LLC. The information provided in this Response is hereby designated CONFIDENTIAL in accordance with the parties' Stipulated Protective Order for this case.**

2. Identify the total income and all financial benefits received by Bellicose Capital, SourcePoint, and any other business owned, in whole or in part, by you arising from any transaction with Big Picture Loans, Ascension Technologies, Red Rock Tribal Lending and Tribal Economic Development Holdings.

**RESPONSE:**

**The Court's September 1, 2017 Order limits discovery to what is necessary to determine jurisdiction over Defendants. Martorello has not, and will not, contest that this Court has personal jurisdiction over him under applicable Fourth Circuit case law. As such Martorello objects to this Interrogatory as it is not relevant to jurisdiction and is violative of the Court's September 1, 2017 Order and Federal Rule of Civil Procedure 26(d). Nonetheless, as explained in the above "Preliminary Statement" which is incorporated herein as if set forth at length, Martorello will, subject to the following objections, respond to this Interrogatory in that it is duplicative of merits discovery as to Martorello and is being treated as merits discovery by Martorello.**

**Martorello objects to this Interrogatory on the grounds that it is not limited to information relevant to a party's claims or defenses in this case and requests information not proportional to the needs of this case. Specifically, the Interrogatory is overly broad in that it is not limited to information relating to loans made to Virginia residents or limited in scope to the relevant time period for this case.**

**Martorello objects to this Interrogatory on the ground that "income" and "financial benefits" are vague and undefined terms.**

**Subject to and without waiving the foregoing, Martorello responds as follows:**

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

LULA WILLIAMS, GLORIA TURNAGE, :  
GEORGE HENGLE, DOWIN COFFY, and : Civil Case No. 3:17cv461  
FELIX GILLISON, JR., *on behalf of themselves* :  
*and all individuals similarly situated,* :  
: :  
Plaintiffs, :  
: :  
v. :  
: :  
BIG PICTURE LOANS, LLC, et al., :  
: :  
Defendants. :

## VERIFICATION

I, Matthew Martorello, state that I have read the foregoing *Responses and Objections to Plaintiff Lula Williams' First Set of Interrogatories Directed to Defendant Matt Martorello* and that the answers contained therein are true and accurate to the best of my knowledge, information and belief, subject to penalties of 28 U.S.C §1746, relating to unsworn falsification to authorities.

Dated: October 2, 2017

  
Matthew Martorello

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of October, 2017, I caused a copy of the foregoing  
*Responses and Revised Objections of Matt Martorello to Plaintiff Lula Williams' First Set of*  
*Interrogatories* to be sent to the following by U.S. Mail, postage paid:

Kristi C. Kelly  
Andrew J. Guzzo  
KELLY & CRANDALL PLC  
3925 Chain Bridge Road, Suite 202  
Fairfax, VA 22030  
Telephone: 703-424-7570  
Facsimile: 703-591-0167  
Email: [kkelly@kellyandcrandall.com](mailto:kkelly@kellyandcrandall.com)  
Email: [aguzzo@kellyandcrandall.com](mailto:aguzzo@kellyandcrandall.com)  
*Counsel for Plaintiffs*

James W. Speer  
VIRGINIA POVERTY LAW CENTER  
919 E. Main Street, Suite 610  
Richmond, VA 23219  
Telephone: 804-782-9430  
Facsimile: 804-649-0974  
Email: [jay@vplc.org](mailto:jay@vplc.org)  
*Counsel for Plaintiffs*

/s/ J. Boughrum

Jonathan P. Boughrum (admitted *pro hac vice*)  
MONTGOMERY MCCracken  
WALKER & RHOADS LLP  
123 South Broad Street, 24<sup>th</sup> Floor  
Philadelphia, PA 19109  
Telephone: (215) 772-7228  
Email: [jboughrum@mmwr.com](mailto:jboughrum@mmwr.com)